

ORIGINAL

30

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

FILED USDC - CLERK DET
2018 APR 3 PM 2:23

KAREN A. SPRANGER,

Plaintiff,

vs.

Hon. George Caram Steeh

COUNTY OF MACOMB, a municipal
entity, a political Subdivision of the
State of Michigan

Case Number 2:18-cv-10005-GCS-DRG

Defendants.

Karen A. Spranger, In Pro Se
Macomb County Clerk/ Register of Deeds*
40 North Main, 1st Floor
Mt. Clemens, Michigan 48043
(586) 469-5120
Karen.spranger@macombgov.org
* rights of appeal preserved*

John A. Schapka (P36731)
Macomb County Corporate Counsel
One S. Main Street, 8th Floor
Mt. Clemens, MI 48043
(586) 469-6346
john.schapka@macombgov.org

7520 Hudson
Warren, MI 48091
(586) 322-2841
karenaspranger@gmail.com

Now here comes Karen A. Spranger, again, seeking Summary Judgment under Rule 56 from the United States District Court of Eastern Michigan. The original January 2, 2018 complaint referenced two counts against the COUNTY OF MACOMB named actors. An updated 219 page filing was provided to the Honorable Court on February 27, 2018 to fill in the blanks. On the same date, oral arguments were heard by Judge Steeh related to the COUNTY OF MACOMB civil conspiracy and violations of SPRANGERS civil rights.

SPRANGER maintains the Federal Court has subject matter jurisdiction over the COUNTY OF MACOMB violations of her United States and Michigan defined Constitutional rights.

The "Federal Question" is :

" Does the named COUNTY OF MACOMB actors have ANY authority, acting under the color of law, to engage in a civil conspiracy against the duly elected Republican Macomb County Clerk/ Register of Deeds Karen A. Spranger- a citizen of the United States of America – by illegally infringing upon her United States Constitutional Rights AND interfering with fulfilling her Constitutional and statutory duties of her Oath of Office?"

COUNTY OF MACOMB has engaged in the violation of SPRANGERS Civil Rights, rights to Vote, rights of Due Process, and has knowingly and willingly interfered with her Equal Protection rights. The State of Michigan has refused to intervene.

The Oath of Office taken by Karen A. Spranger on December 5, 2016 was:

" I , Karen A. Spranger, do solemnly swear that I will support the Constitution of the United States and the Constitution of the State of Michigan , and that I will faithfully discharge the duties of the office of Macomb County Clerk and Register of Deeds according to the best of my ability."

Karen A. SPRANGER asserts that federal court **has subject matter jurisdiction** as the United States Constitution uniquely possesses the Supremacy Clause. (U.S. Constitution

Article VI, Clause 2). When the State fails to act to protect the rights, privileges, and immunities of its citizens, the federal government must intercede accordingly. United States Constitution 14th Amendment.

The original Counts are 42 USC 1983 civil rights violations and 42 USC 1985(3) are stated , verbatim, for the record, in this request for Summary Judgment under Rule 56:

42 U.S.C §1983. Civil action for deprivation of rights

Every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia, subjects, or causes to be subjected, any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law, suit in equity, or other proper proceeding for redress, except that in any action brought against a judicial officer for an act or omission taken in such officer's judicial capacity, injunctive relief shall not be granted unless a declaratory decree was violated or declaratory relief was unavailable

42 USC §1985. Conspiracy to interfere with civil rights

(3) Depriving persons of rights or privileges

If two or more persons in any State or Territory conspire or go in disguise on the highway or on the premises of another, for the purpose of depriving, either directly or indirectly, any person or class of persons of the equal protection of the laws, or of equal privileges and immunities under the laws; or for the purpose of preventing or hindering the constituted authorities of any State or Territory from giving or securing to all persons within such State or Territory the equal protection of the laws; or if two or more persons conspire to prevent by force, intimidation, or threat, any citizen who is lawfully entitled to vote, from giving his support or advocacy in a legal manner, toward or in favor of the election of any lawfully qualified person as an elector for President or Vice President, or as a Member of Congress of the United States; or to injure any citizen in person or property on account of such support or advocacy; in any case of conspiracy set forth in this section, if one or more persons engaged therein do, or cause to be done, any act in furtherance of the object of such conspiracy, whereby another is injured in his person or property, or deprived of having and exercising any right or privilege of a citizen of the United States, the party so injured or deprived may have an action for the

recovery of damages occasioned by such injury or deprivation, against any one or more of the conspirators.

SPRANGER seeks relief from the Honorable Court in the form of Summary Judgment, preferably in whole, or alternatively in part, against the COUNTY OF MACOMB civil conspirators that have egregiously violated her civil rights by civil conspiracy.

A. DISSOLUTION OF ST.CLAIR COUNTY STATE CIRCUIT COURT CASE

2017-002261-CZ "Quo Warranto" : ALLOW ORIGINAL CASE TO BE HEARD

Filed June 22, 2017 by Karen A. Spranger, Macomb County Clerk/Register of Deeds, in her Official capacity. The original case sought to clarify her authority under Michigan state statutes. The case was filed against MACOMB COUNTY (a.k.a COUNTY OF MACOMB) , MACOMB COUNTY BOARD OF COMMISISONERS, MARK HACKEL, MACOMB COUNTY EXECUTIVE, and MACOMB COUNTY BOARD OF ETHICS.

The seven counts raised in the 2017-002261-CZ lawsuit- seeking declaratory judgment and injunction- was transferred to St. Clair County after a recusal of all of the Macomb County 16th Judicial Circuit Court judges were:

1) Ability to allow citizens to open carry their firearms- and CPL (Concealed Pistol License) holders to bring their firearms into a government building in order to preserve and protect their 2nd Amendment rights to the United States Constitution. SPRANGER attempted to enforce citizen rights taken away by the COUNTY OF MACOMB actors.

The United States Constitution 2nd Amendment indicates:

"A well regulated Militia, being necessary to the security of a free State, the right of the people to keep and bear Arms, shall not be infringed."

2) The removal of SPRANGERS Michigan statutory defined Duties and Responsibilities as "Clerk of the Commission" for the Macomb County Board of Commissioners under MCL 46.4 (Public Act 156 of 1851). The Macomb County Board of Commissioners changed their "Board Rules" in Resolution 2017-211 to rob SPRANGER of her duties and responsibilities as defined in the statutes. They claim they are using an electronic vote system called "BOARDSYNC", and that the Clerk of the Commission duties are voided. The Legislatures intent in the Public Act does not reference BOARDSYNC.

The United States Constitution 14th Amendment is the **Equal Protection Clause** which should be enforced as "Equal Justice Under Law" .The text of the 14th Amendment, Section 1 indicates:

Section 1. All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside. No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.

SPRANGER asserts the Macomb County Board of Commissioners have created, by their actions, a violation of the privileges and immunities afforded to the Macomb County Clerk/ Register of Deeds by discriminating against her statutory rights and

duties by effectuating this discriminatory anti-SPRANGER resolution. The Board of Commissioners, by their collective action, violated Michigan statutory laws.

3) Chief Judge James BIERNAT Jr., along with co-conspirators DELDIN, SCHAPKA, and BATHANTI refused to allow SPRANGER to appoint Denise GREINER as her appointed Chief Deputy as afforded under Michigan statute MCL 50.63.

50.63 County clerk; deputies, appointment.

Each county clerk shall appoint 1 or more deputies, to be approved by the circuit judge, 1 of whom shall be designated in the appointment as the successor of such clerk in case of vacancy from any cause, and may revoke such appointment at his pleasure, which appointment and revocation shall be in writing, under his hand, and filed in the office of the county treasurer, and the deputy or deputies, may perform the duties of such clerks.

The position was budgeted as full time; however, SPRANGER asserts the controversy centers around the insurance clause only. SPRANGER has rights to appoint. The County Actors opted to reference the restrictive Macomb County Retirement Ordinance **2016-06** to refuse SPRANGER to appoint her selection of a very experienced Chief Deputy candidate . BIERNAT, along with SCHAPKA, DELDIN, BATHANTI, and even BOVENSHEN purposely avoided any of SPRANGERS selections to fill the at-will appointed position . This furthered their efforts to erode SPRANGERS co-employer **Management Rights** under the labor organization Collective Bargaining Agreements. This is an area where the named COUNTY OF MACOMB actors conspired to disable SPRANGERS Michigan Constitutional and statutory rights.

CONSTITUTION OF MICHIGAN OF 1963

Article VI § 14 County clerks; duties, vacancies; prosecuting attorneys, vacancies.

The clerk of each county organized for judicial purposes or other officer performing the duties of such office as provided in a county charter shall be clerk of the circuit court for such county. The judges of the circuit court may fill a vacancy in an elective office of county clerk or prosecuting attorney within their respective jurisdictions.

Article 7 § 4 County officers; terms, combination.

*There shall be elected for four-year terms in each organized county a sheriff, a county clerk, a county treasurer, a register of deeds and a prosecuting attorney, **whose duties and powers shall be provided by law**. The board of supervisors in any county may combine the offices of county clerk and register of deeds in one office or separate the same at pleasure.*

4) SPRANGER was interested in a **financial audit** of the Register of Deeds revenue accounts in order to pursue an alteration of a state mandated fee for the filing of recorded instruments. **MCL 600.2567** afforded Charter counties (which Macomb County is defined under Michigan **Public Act 293 of 1966**) an opportunity to adjust the fees to reflected only to justified "cost of services". The Macomb County Board of Commissioners infringed upon SPRANGERS rights to **challenge** the statutory fees. This was basically where the COUNTY OF MACOMB actor DELDIN and SCHAPKA disallowed an accounting of all revenue funds via **external forensic audit**.

**REVISED JUDICATURE ACT OF 1961 (EXCERPT)
Act 236 of 1961 600.2567 Register of deeds; fees.**

(3) A charter county may impose a fee schedule by ordinance or resolution with different amounts than the amounts prescribed by subsection (1). **A charter county shall not impose a fee that is greater than the cost of the service for which the fee is charge**

5) The complaint against the MACOMB COUNTY ETHICS BOARD was dismissed by

Judge Daniel Kelly as he judicially interpreted that the Macomb County Ethics Board is not a legal entity. The issue was swept under the rug. SPRANGERS Due Process rights were completely railroaded by DELDIN, SCHAPKA, BATHANTI, and CANGEMI- along with slanted news reported by COOK and COLTHORP in the absence of any formal hearing processes and rules of procedures. The Macomb County Ethics Board is a kangaroo court , where the five members are HACKEL appointee donors approved by the Macomb County Board of Commissioners. It should be noted that Ethics Board member James McGrail , went on to be rewarded for his participation in the civil conspiracy by being appointed as a “magistrate” of the 41-B District Court. MCGRAIL further eroded SPRANGERS civil rights by a) signing a subpoena to acquire SPRANGERS digital assets from GOOGLE LLC. , and b) signing the illegal search warrant that led to the Mark MORFINO ‘ badged democrat puppets clan’ to break into SPRANGERS home on October 25, 2017 - acting under the color of law to violate SPRANGERS 4th Amendment rights.

6) **DELDIN, SCHAPKA, BATHANTI, and CANGEMI** conspired to have SPRANGERS computer access to records disabled for two months. These COUNTY OF MACOMB actors conspired against SPRANGERS Due Process Rights. There was no investigation and SPRANGER wanted the Circuit Court to discover from the COUNTY OF MACOMB actors what authority, under law, they had to disable SPRANGERS access to her records by false claims and baseless allegations. Their collective actions are a violation of the United States Constitution in several amendments:

The 5th Amendment indicates " "No person shall ... be deprived of life, liberty, or property, without due process of law .."

AND

Section 1 of the 14th Amendment indicates:" [N]or shall any State deprive any person of life, liberty, or property, without due process of law

The Defendants, COUNTY OF MACOMB, filed a counter-claim- in 2017-002261-CZ of quo warranto against Karen A. Spranger , both in her individual and Official Capacities, on September 24, 2017. This was where a bogus criminal perjury charge was waged against SPRANGERS U.S. Constitution **15th Amendment Right to Vote.**

The Fifteenth Amendment (Amendment XV) to the United States Constitution prohibits the federal and state governments from denying a citizen the right to vote based on that citizen's "race, color, or previous condition of servitude"

The " Right to Vote" is outlined five specific times in the United States Constitution.

The COUNTY OF MACOMB conspired to dissolve Karen A. SPRANGERS "qualified and registered voter" status.

SPRANGER WILL BE APPEALING THE POLITICALLY MOTIVATED "WRIT OF QUO WARRANTO" –SPONSORED BY THE COUNTY OF MACOMB ACTORS- IN THE MICHIGAN COURT OF APPEALS

The COUNTY OF MACOMB actors devised an "administrative" criminal case spearheaded by **HACKEL** donor/ developer named VERGOTE -whose identity has been kept "anonymous" by WICKERSHAM , but openly divulged by the leaked document to WDIV co-conspirator Jason James COLTHORP, whom allegedly resides at 30736 Moulin in Warren, Michigan , who along with his two neighbors residing at 30760 Moulin in Warren, Michigan, coincidentally belonging to the AFSCME labor

organization (**Case 2017-004056-CL**) . One union employee was the retired moody and maladaptive Administrative Secretary insubordinate to SPRANGER; the other was the AFSCME union daughter who works for , ironically, the Macomb County Sheriffs Department.

The Macomb County Sheriff Anthony **WICKERSHAM**, well known for his persecution of any political foes (referenced in the federal case **BAKER vs. MACOMB COUNTY- case 2:13-cv-13279**), used county resources to attempts to acquire SPRANGERS digital assets from GOOGLE LLC (**Case 2017-004047-CZ**), then raided her home . It should be noted that WICKERSHAM received a \$1000 bribe (campaign contribution) from the political action committee MACOMB BUSINESS UNITED just prior to the illegal 2016 daytime fundraiser called “ City Of Warren-State of the City” in April 2016. SPRANGER submitted a report to the Michigan Secretary of State, where the implication of WICKERSHAM still remains to this day, under investigation. SPRANGER has been targeted by WICKERSHAM for reporting his illegal activities. **There is no doubt** WICKERSHAM targeted SPRANGER. His hands are “caught in the cookie jar”.

This is a violation of SPRANGERS **4th Amendment rights defined in the United States**

Constitution:

*“The right of the people to be **secure in their persons, houses, papers, and effects**, against **unreasonable searches and seizures**, shall not be violated, and no Warrants shall issue, but upon probable cause, supported by Oath or affirmation, and particularly describing the place to be searched, and the persons or things to be seized.”*

The COUNTY OF MACOMB actors furthered their civil suit discovery in **2017-002261-cz** by using the bogus criminal perjury investigation to break into SPRANGERS home and

trample upon many of her personal belongings. The video of their staged event was then shared with Jason James COLTHORP of Ferndale, Michigan on their WDIV Channel 4 newscast on December 15, 2017. This is the same day that Jason James COLTHORP trespassed upon my property and attempted to break into the home- after peeping into the windows. COLTHORPs "source" and the COUNTY OF MACOMBS "star witness neighbor" in the 'quo warranto' action gave a false name on his investigative witness report, and has spent hard time in Michigans Jackson Prison for sex related and then bad drug related charges. Senior citizen SPRANGER is cautious in making announcements when she is home for reasons apparent.

B. DISSOLUTION OF Case 2017-004056-CL (AFSCME LABOR ORGANIZATION)

The Democrat Party labor organization filed a civil action in October 27, 2017 in the 16th Judicial Circuit Court of Macomb County as a frivolous means of harassing and intimidating Karen A. Spranger. There were corresponding Unfair Labor Practice charges filed with the Michigan Employment Relations Commission where the Democrat party labor organization civil conspirators CANGEMI, BATHANTI, DELDIN, and SCHAPKA conspired to have an injunction and temporary restraining order originate at the state Circuit Court level. The Macomb County Board of Commissioners denied SPRANGER access to legal counsel in her November 7, 2017 request. SPRANGER had to represent herself, in her Official capacity, in court

against the overly exaggerated labor organization claims waged by CANGEMI and BATHANTI of creating a ` hostile work environment.

An evidentiary hearing was held December 19, 2017 at the Detroit Offices of the Michigan Employment Relations Commission. Briefs were submitted to Administrative Law Judge Travis Calderwood. The law firm hired by the CANGEMI labor organization conveniently has a law office located at **600 West Lafayette Boulevard, 4th Floor in Detroit , Michigan**. This building is identified as the headquarters of the Plaintiffs AFSCME Michigan Council 25. IRONICALLY, WDIV CHANNEL 4 Detroit (where COUNTY OF MACOMB co-conspirator COLTHORP stages his news anchor antics) is located at 550 West Lafayette in Detroit, Michigan. This proximity-is-dangerous observation confirms how multiple internal confidential public records by DELDIN, SCHAPKA, CANGEMI, BIERNAT, and BATHANTI are leaked to COLTHORP.

A dissolution of this case is sought as the Public Employment Relations Act MCL 423. affords SPRANGER her DUE PROCESS rights under the Michigan Administrative Hearing System. The judges of the 16th Judicial Circuit Court have all been conflicted out since the filing of their lawsuit (**2017-004508-AW**) against SPRANGER.

C. DISSOLUTION OF CASE 2017-004508-AW (Mandamus action)

On November 27, 2017, a complaint for mandamus and injunctive relief was filed by the COUNTY OF MACOMB on behalf of the SIXTEENTH CIRCUIT COURT, COUNTY TREASURER, and COUNTY SHERIFF. This action was basically interfering with SPRANGERS

rights to have terminated three union employees for their illegal work slowdown/strike, and a fourth for not adhering to her job classification responsibilities under the Collective Bargaining Agreements. The Management Rights clause of each contract is clear:

The Employer retains and shall have the sole and exclusive right and authority to manage and operate its affairs, including all of its operation and activities; to decide the number of employees; to establish the overall operation, policies and procedures of the Employer; to assign employees to shifts in order to adequately staff shifts with appropriate personnel; to schedule the shifts of all employees; to direct its working force of employees; to determine the methods, procedures and services to be provided; to comply with P.A. 390, as amended, known as the State's Emergency Act and the County's Emergency Management resolution as well as all related plans, policies, and procedures covered by these statutes. All of the rights are vested exclusively in the Employer.

The 16th Circuit Court, Treasurer, and Sheriff have, in collusion with BATHANTI, CANGEMI, BIERNAT, DELDIN, and SCHAPKA countered the Management Rights of SPRANGER under the Michigan Public Employment Relations Act regarding striking workers.

MCL 423.206 Public employee; conduct considered to be on strike; proceeding to determine violation of act; time; decision; review; applicability of subsection (2) to penalty imposed under MCL 423.202a. Sec. 6. (1) Notwithstanding the provisions of any other law, a public employee who, by concerted action with others and without the lawful approval of his or her superior, willfully absents himself or herself from his or her position, or abstains in whole or in part from the full, faithful and proper performance of his or her duties for the purpose of inducing, influencing or coercing a change in employment conditions, compensation, or the rights, privileges, or obligations of employment, or a public employee employed by a public school employer who engages in an action described in this subsection for the purpose of protesting or responding to an act alleged or determined to be an unfair labor practice committed by the public school employer, shall be considered to be on strike.

SPRANGER disciplined the employees. BATHANTI placed them on 'administrative leave'- which is not defined in any Collective Bargaining Agreement.

D. CEASE AND DESIST FOR THE COUNTY OF MACOMB ACTORS TO FURTHER THEIR CIVIL CONSPIRACY OF INTERFERENCE IN THE MANAGEMENT AND OPERATIONS OF THE MACOMB COUNTY CLERK/REGISTER OF DEEDS OFFICES

As identified in the original January 2, 2018 complaint, and fortified in the February 27, 2018 filing, the named COUNTY OF MACOMB actors are identified as John SCHAPKA, Mark DELDIN, Donna CANGEMI, James BIERNAT Jr., Karen BATHANTI, Jameson COOK, and Jason James COLTHORP. The supplemental information and exhibits regarding the Democrat party union labor organizations outlining the UAW-V PAC contributions to the Macomb County Board of Commissioners describes the details of the buying of political influence in the corrupt Macomb County municipal government entity. SPRANGER has been retaliated against for fulfilling her Constitutional and statutory duties and responsibility and adhering to her Oath of Offices. The COUNTY OF MACOMB actors have usurped the Offices of the duly elected Macomb County Clerk/ Register of Deeds Karen A. Spranger.

E. SPRANGER SEEKS AN ORDER OF THE COURT TO RESTORE ALL TERMINATED EMPLOYEES BACK TO THEIR POSITIONS

The actions taken by BATHANTI on December 21, 2017 have violated the employee rights under the Equal Employment Opportunity Act (47 U.S. Code § 554).

SPRANGER seeks to have them restored to their prior positions without any loss of compensation or benefits they would have been entitled to in absence of the civil conspiracy.

F. PROTECTIVE ORDER under RULE 26(C) SEEKING REDRESS from the COURT to prevent the COUNTY OF MACOMB ACTORS from their harassment anticipated if discovery proceeds

G. AN ORDER OF THE COURT GRANTING SUCH OTHER RELIEF THAT PLAINTIFF IS FOUND TO BE ENTITLED TO

Karen A. Spranger is the victim of a systematic civil conspiracy to erode her Official duties and responsibilities- along with glaring violations of her Constitutional civil rights. SPRANGER seeks favorable judgment from the Court that effectively prevents the COUNTY OF MACOMB actors from using any further taxpayer dollars in their collaborative vindictive vendetta against SPRANGER.

PRAYER FOR RELIEF

COUNTY OF MACOMB infuses their mumbo jumbo reference to the disjunctive Rooker-Feldman doctrine to erroneously assess that this Honorable Court be tricked into believing that Karen A. Spranger doesn't perfectly fit into all three of the well defined valid exceptions. Furthermore, the brief summary response by co-conspirator SCHAPKA, and the rambling incoherent diatribe affidavit submitted by COUNTY OF MACOMB Assistant Corporate Counsel Peter Jensen fails to recognize the 77 valid points of civil conspiracy evidence in the February 27, 2018 filing by SPRANGER. The Federal Question is posed; the relief sought is

defined. The Court has a duty to Karen A. Spranger to affirmatively approve her request for Summary Judgment under Rule 56 as the evidence of civil rights violations and civil conspiracy perpetrated by the COUNTY OF MACOMB actors are clear and compelling violations of United States Constitution and Michigan Constitution laws and statutes. SPRANGER asserts her prayer for relief is justified and unique under multiple jurisdictional authorities. SPRANGER has already pursued additional remedies in order to protect and preserve her rights, privileges , and immunities as a duly elected Constitutional Officer , Clerk of the Court, and Register of Deeds in Macomb County , Michigan. A copy of the "ADMINISTRATIVE CLAIM NOTICE OF ADMINISTRATIVE OVERTHROW OF A CONSTITUTIONAL OFFICE CLERK OF COURT OF MACOMB COUNTY BY ROGUE COUNTY ACTORS"

Respectfully Submitted.

Karen A. Spranger


April 2, 2018

INDEX OF AUTHORITIES

United State Constitution

Supremacy Clause (Article VI, Section 2).....	Page 2
14 th Amendment	Page 3 , 5, 9
2 nd Amendment.....	Page 4,5
5 th Amendment	Page 9
15 th Amendment Right to Vote.....	Page 9
4 th Amendment.....	Page 10

Michigan Constitution

Article VI Section 14.....	Page 6
Article VII Section 4.....	Page 7

Michigan State Statutes (MCLs)

MCL 46.4 Public Act 156 of 1851.....	Page 5
MCL 50.63.....	Page 6
MCL 600.2567 Public Act 236 of 1961.....	Page 7
MCL 423 Public Employment Relations Act (PERA)	Page 12,13
Public Act 293 of 1966 Charter County Act.....	Page 7

Code of Federal Regulations (CFRs)

42 USC 1983.....	Page 3
42 USC 1985(3).....	Page 3
47 USC 554 Equal Employment Opportunities VII.....	Page 14

Federal Court Rules

Rule 56	Pages 1, 3, 16
Rule 26 (c)	Page 15

Federal court case reference

Baker v. Macomb County	Page 10
------------------------------	---------

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

FILED USDC - CLRK DET
2018 APR 3 PM 2:30

[Handwritten signature/initials]

KAREN A. SPRANGER,

Plaintiff,

Hon. George Caram Steeh

vs.

COUNTY OF MACOMB, a municipal
entity, a political Subdivision of the
State of Michigan

Case Number 2:18-cv-10005-GCS-DRG

Defendants.

Karen A. Spranger, In Pro Se
Macomb County Clerk/ Register of Deeds *
40 North Main, 3rd Floor
Mt. Clemens, Michigan 48043
(586) 469-5120
Karen.spranger@macombgov.org
ALL appeal right preserved

John A. Schapka (P36731)
Macomb County Corporate Counsel
One S. Main Street, 8th Floor
Mt. Clemens, MI 48043
(586) 469-6346
john.schapka@macombgov.org

PROOF OF SERVICE

On April 3, 2018, Karen A. Spranger **hand-delivered** a court stamped copy of the
following entitled document:

"PLAINTIFF RESPONSE TO DEFENDANTS MOTION FOR SUMMARY DISPOSITION

"

to address: Corporate Counsel Department , One North Main Street. 8th Floor, Mount Clemens,
Michigan 48043

to address : United States District Court, Eastern District of Michigan, Southern Division
211 West Fort Street, 5th Floor, Detroit , Michigan 48226

Karen A. Spranger
Karen A. Spranger

**Macomb County Register of Deeds
Clerk of the 16th Judicial Circuit Court** ** all rights of appeal preserved**
April 3 , 2018

class, Rodney-Dale
Private Attorney General
14th Amendment section 4
Constitutional Bounty Hunter
1063 Jesse Drive
Cleveland, North Carolina 27013

**ADMINISTRATIVE CLAIM NOTICE OF ADMINISTRATIVE
OVERTHROW OF A CONSTITUTIONAL OFFICE
CLERK OF COURT OF MACOMB COUNTY
BY ROGUE COUNTY AGENTS
(2018.04.02)**

Karen A. Spranger
Constitutional Office
of the Clerk of Court
MaComb County
On behalf of the People

Topic: Overthrow of a Constitutional Public Office violation.

Relief: Immediate investigation and injunction to stop the overthrow of a Constitutional Public Office

Attn: Michigan Governor Office
Governor Rick Snyder
P.O. Box 30013
Lansing, Michigan 48909

In the United States District Court
for the Eastern District of MI Southeastern Div.
Hon George Caramel Steeh
Case number. 2:18-cv-10005-GCS-DRG

United States Attorney Mike Stuart
Department of Justice
U.S. Attorney Office
Southern District of West Virginia
Sidney L. Christie Federal Building
845 Fifth Avenue
Huntington, WV, 25701

David P. Gelios FBI
477 Michigan Ave., 26th Floor
Detroit, MI 48226

Detroit Main Office
United States Attorney's Office
211 W. Fort Street, Suite 2001
Detroit, MI 48226

President Donald Trump
White House
1600 Pennsylvania Avenue NW
Washington,DC 20500

COURT ENFORCEMENT OF CONSTITUTIONAL OR
LEGISLATIVE MANDATE

The governor may initiate court proceedings in the name of the state to enforce compliance with any constitutional or legislative mandate, or to restrain violations of any constitutional or legislative power, duty or right by any officer, department or agency of the state or any of its political subdivisions. This authority shall not be construed to authorize court proceedings against the legislature.

Attn: Administrative Heads under a sworn Oath the Constitution.

I, Karen A, Spranger being a duly sworn officer of MaComb County in Michigan as a Clerk of Court under the Constitution of Michigan and the United States Constitution, Clerk/Register of Deeds come before your administration to report a crime of Constitutional violation of the overthrow of my Constitutional offices.

1. I, was elected by the people of Macomb County under the conditions that I would clean up the corruption and misuse of public funds that comes into this court by the people of Michigan. On that bases I was elected by the people to this Constitutional office that I held.
2. Upon my promise and sworn oath to the people of Macomb County, I started to to enforce the Charter, "Home Rule Charter of Macomb County, MI approved by the Macomb County Charter Commission, June 17, 2009 and the Human Resources and Labor Relations (HRLR) manual that defines the office of the Clerk of Court for Macomb County.
3. As any newly elected officials to a public office I was aware that the older employees of this clerk of court office, Clerk/Register of Deeds had their routine to which they were a custom to from the old Clerk of Court Carmella Sabaugh when she ran this office.
4. When it came time for me to taking over the finance side of the Clerk of Court Office the former Clerk of Court willfully disregarded MCL 50.62 to transfer all the financial books, seals, stamps, records and other document of the Clerk of Court office to allow me to run the office and address the budget and the bank deposits and the money received by the Court from the people of Michigan on Court cases.
5. The more I inquired to discover about the financial book and records the more resistance I started to receive from a couple of the employees in my offices especially the supervisors from Local 412. Being new to this office I tried to explain the Charter and the HRLR that I was entitled to have this information to run this efficiently so I would have a better understand of the budget for this office.

6. I started to become aware of the funds coming in, to what was showing on the books. I began to question two of my staff members and understand why is there a difference. Their attitude toward me became insubordinate as I was their superior and it appeared that funds was not being accoutered for. I had no choice to relief them of their official duties on the ground of misconduct.

7. As I was being stonewalled I started to discover backlogs of over 1600 e-filing and court cases being delayed such as Union UAW Local 412 and that Collective Bargaining Agreements were in jeopardy do to inside interference.

8. The more I tried to address the misconduct of my office employees the more I was seeing corruption and willful negligence and unethical behavior toward the people who came before this clerk of court and have their cases filed.

9. I received a complaint to investigate on a certain court cases and allow issue that would violate the honesty of this public office.

10. I started to go to their other county departments heads and administration and explain that this a constitutional office and the Charter and HRLR interfered with my duties as the county clerk.

10a. My job description is under statutory laws and that I was required to attend training from United County Officers Association, paragraph 1, "States legal basis for County Personnel Administration:

10b. Outfits of the traditional playing over home the elected official it's giving statutory authority to hire, manage and terminate employees are under the control of the elected officials and not under the Board of Commissioners."

11. The next thing I know I have the Sheriff department raid and ram shack my department I was brought up on charges for the release of the two clerk whom I relieved of duty for misconduct to which the regulation empowered to this office I had every right to terminate supervisor for a walk out strike.

12. My position has now been overthrown by several department heads in the county in direct violation of the charter and this state constitution as listed below.

13. As governor of Michigan your duty to protect the peoples rights and to protect this public office under the constitution of this State and for breach of trust and constitutional violation being done by other administrative department to ruin the integrity dignity of this office. I come before your office under the constitution of this State and ask you to intervene and to enforce the constitution as defined in this State Constitution as shown below. by insurrection and repel invasion.

Constitutional references:

§ 12 Military powers.

Sec. 12. The governor shall be commander-in-chief of the armed forces and may call them out to execute the laws, suppress insurrection and repel invasion.

§ 4 Militia.

Sec. 4. The militia shall be organized, equipped and disciplined as provided by law.

MICHIGAN MILITARY ACT (EXCERPT)

Act 150 of 1967

32.509 State military establishment; composition; organized and unorganized militia.

Sec. 109.

The organized militia of this state taken collectively shall be known as the state military establishment and constitutes the armed forces of this state. The organized militia consists of the army national guard, the air national guard, and the defense force when actually in existence as provided in this act. The unorganized militia consists of all other able-bodied citizens of this state and all other able-bodied citizens who are residents of this state who have or shall have declared their intention to become citizens of the United States, who shall be age 17 or over and not more than age 60, and shall be subject to state military duty as provided in this act.

JURISDICTION

CONSTITUTIONAL PROVISION FOR THE CLERK OF COURT

ARTICLE VI JUDICIAL BRANCH

§ 14 County clerks; duties, vacancies; prosecuting attorneys, vacancies.

Sec. 14. The clerk of each county organized for judicial purposes or other officer performing the duties of such office as provided in a county charter shall be clerk of the circuit court for such county. The judges of the circuit court may fill a vacancy in an elective office of county clerk or prosecuting attorney within their respective jurisdictions

ARTICLE II ELECTIONS

§ 5 Time of elections.

Sec. 5. Except for special elections to fill vacancies, or as otherwise provided in this constitution, all elections for national, state, county and township offices shall be held on the first Tuesday after the first Monday in November in each even-numbered year or on such other date as members of the congress of the United States are regularly elected.

ARTICLE III GENERAL GOVERNMENT

§ 5 Intergovernmental agreements; service by public officers and employees.

Sec. 5. Subject to provisions of general law, this state or any political subdivision thereof, any governmental authority or any combination thereof may enter into agreements for the performance,

financing or execution of their respective functions, with any one or more of the other states, the United States, the Dominion of Canada, or any political subdivision thereof unless otherwise provided in this constitution. Any other provision of this constitution notwithstanding, an officer or employee of the state or of any such unit of government or subdivision or agency thereof may serve on or with any governmental body established for the purposes set forth in this section and shall not be required to relinquish his office or employment by reason of such service. The legislature may impose such restrictions, limitations or conditions on such service as it may deem appropriate

ARTICLE IV LEGISLATIVE BRANCH

§ 24 Laws; object, title, amendments changing purpose.

Sec. 24. No law shall embrace more than one object, which shall be expressed in its title. No bill shall be altered or amended on its passage through either house so as to change its original purpose as determined by its total content and not alone by its title

§ 48 Disputes concerning public employees.

Sec. 48. The legislature may enact laws providing for the resolution of disputes concerning public employees, except those in the state classified civil service

ARTICLE V EXECUTIVE BRANCH

§ 8 Principal departments, supervision of governor; information from state officers

Sec. 8. Each principal department shall be under the supervision of the governor unless otherwise provided by this constitution. The governor shall take care that the laws be faithfully executed. He shall transact all necessary business with the officers of government and may require information in writing from all executive and administrative state officers, elective and appointive, upon any subject relating to the duties of their respective offices.

Court enforcement of constitutional or legislative mandate.

The governor may initiate court proceedings in the name of the state to enforce compliance with any constitutional or legislative mandate, or to restrain violations of any constitutional or legislative power, duty or right by any officer, department or agency of the state or any of its political subdivisions. This authority shall not be construed to authorize court proceedings against the legislature.

ARTICLE VII LOCAL GOVERNMENT

§ 1 Counties; corporate character, powers and immunities.

Sec. 1. Each organized county shall be a body corporate with powers and immunities provided by law

§ 2 County charters.

Sec. 2. Any county may frame, adopt, amend or repeal a county charter in a manner and with powers and limitations to be provided by general law, which shall among other things provide for the election of a charter commission. The law may permit the organization of county government in form different from that set forth in this constitution and shall limit the rate of ad valorem property taxation for county purposes, and restrict the powers of charter counties to borrow money and contract debts. Each charter

county is hereby granted power to levy other taxes for county purposes subject to limitations and prohibitions set forth in this constitution or law. Subject to law, a county charter may authorize the county through its regularly constituted authority to adopt resolutions and ordinances relating to its concerns.

§ 4 County officers; terms, combination.

Sec. 4. There shall be elected for four-year terms in each organized county a sheriff, a county clerk, a county treasurer, a register of deeds and a prosecuting attorney, whose duties and powers shall be provided by law. The board of supervisors in any county may combine the offices of county clerk and register of deeds in one office or separate the same at pleasure.

§ 11 Indebtedness, limitation.

Sec. 11. No county shall incur any indebtedness which shall increase its total debt beyond 10 percent of its assessed valuation

§ 32 Budgets, public hearing.

Sec. 32. Any county, township, city, village, authority or school district empowered by the legislature or by this constitution to prepare budgets of estimated expenditures and revenues shall adopt such budgets only after a public hearing in a manner prescribed by law.

§ 33 Removal of elected officers.

Sec. 33. Any elected officer of a political subdivision may be removed from office in the manner and for the causes provided by law

ARTICLE IX FINANCE AND TAXATION

§ 21 Accounting for public moneys.

Sec. 21. The legislature shall provide by law for the annual accounting for all public moneys, state and local, and may provide by law for interim accounting.

§ 23 Financial records; statement of revenues and expenditures.

Sec. 23. All financial records, accounting, audit reports and other reports of public moneys shall be public records and open to inspection. A statement of all revenues and expenditures of public moneys shall be published and distributed annually, as provided by law.

§ 29 State financing of activities or services required of local government by state law.

Sec. 29. The state is hereby prohibited from reducing the state financed proportion of the necessary costs of any existing activity or service required of units of Local Government by state law. A new activity or service or an increase in the level of any activity or service beyond that required by existing law shall not be required by the legislature or any state agency of units of Local Government, unless a state appropriation is made and disbursed to pay the unit of Local Government for any necessary increased costs. The provision of this section shall not apply to costs incurred pursuant to Article VI, Section 18.

ARTICLE XI PUBLIC OFFICERS AND EMPLOYMENT

§ 1 Oath of public officers.

Sec. 1. All officers, legislative, executive and judicial, before entering upon the duties of their respective offices, shall take and subscribe the following oath or affirmation: I do solemnly swear (or affirm) that I will support the Constitution of the United States and the constitution of this state, and that I will faithfully discharge the duties of the office of according to the best of my ability. No other oath, affirmation, or any religious test shall be required as a qualification for any office or public trust.

§ 2 Terms of office of state and county officers.

Sec. 2. The terms of office of elective state officers, members of the legislature and justices and judges of courts of record shall begin at twelve o'clock noon on the first day of January next succeeding their election, except as otherwise provided in this constitution. The terms of office of county officers shall begin on the first day of January next succeeding their election, except as otherwise provided by law.

§ 4 Custodian of public moneys; eligibility to office, accounting.

Sec. 4. No person having custody or control of public moneys shall be a member of the legislature, or be eligible to any office of trust or profit under this state, until he shall have made an accounting, as provided by law, of all sums for which he may be liable.

§ 7 Impeachment of civil officers.

Sec. 7. The house of representatives shall have the sole power of impeaching civil officers for corrupt conduct in office or for crimes or misdemeanors, but a majority of the members elected thereto and serving therein shall be necessary to direct an impeachment.

Trial by senate; oath, presiding officer.

Every impeachment shall be tried by the senate immediately after the final adjournment of the legislature. The senators shall take an oath or affirmation truly and impartially to try and determine the impeachment according to the evidence. When the governor or lieutenant governor is tried, the chief justice of the supreme court shall preside.

Conviction; vote, penalty.

No person shall be convicted without the concurrence of two-thirds of the senators elected and serving. Judgment in case of conviction shall not extend further than removal from office, but the person convicted shall be liable to punishment according to law.

Judicial officers, functions after impeachment.

No judicial officer shall exercise any of the functions of his office after an impeachment is directed until he is acquitted.

ARTICLE Schedule SCHEDULE AND TEMPORARY PROVISIONS

§ 3 Officers, continuance in office

Sec. 3. Except as otherwise provided in this constitution, all officers filling any office by election or appointment shall continue to exercise their powers and duties until their offices shall have been abolished or their successors selected and qualified in accordance with this constitution or the laws enacted pursuant thereto.

Terms of office.

No provision of this constitution, or of law or of executive order authorized by this constitution shall shorten the term of any person elected to state office at a statewide election on or prior to the date on which this constitution is submitted to a vote. In the event the duties of any such officers shall not have been abolished or incorporated into one or more of the principal departments at the expiration of his term, such officer shall continue to serve until his duties are so incorporated or abolished.

14. I ran and won on the Republican ticket under a three party campaign. Once I enter the office of County Clerk as a republican and not as the normal democrat, I was opposed immediately on every front and on every subject.

Conclusion

I enlisted the aid of a bar attorney in hopes to address this problem to find out that I was being sold out and no possible defense as he refuse to address the state and federal constitution, administrative remedies and even the charter of this position of County Clerk.

As a last resort some of my electorate who put me in office told me about a gentleman name Rodney Class, who understands administrative procedure and has gone before North Carolina Office of Administrative Hearing and hold Congressional Position as a Private Attorney General and a Constitutional Bounty Hunter under the 14th amendment section 4.

My understanding is that under the 14th amendment section 4 under the Federal amendments, the State of Michigan is entitled to bounty to any public office that is violation of the constitutional under insurrection rebellion or any acts of mutiny to over throw the leadership of this office to off set this state public debt by the mutineers.

Whereas my office being a constitutional office as Clerk of the County who is trying to uphold the constitution and to ensure that any and all funds under the Michigan's Governor's Highway Safety Act, pursuant 23 USC section 402 and under 23 CFR 1327 and under the political subdivision section 1250 of the Highway Safety ACT, shows that Federal funding is available to political subdivisions including all counties and cities, and

All other Federal funding and grants that passes through this court system are not being accounted for by my office of the Clerk of Courts. The parties name here denied my access to all the income, funds, and records. My office is accountable for and all records and document and bank accounts have not been turned over but has been embezzle from me . I have no choice be to report a crime and possible theft of public funds! I have been remove and barred from my elected office by the defendants.

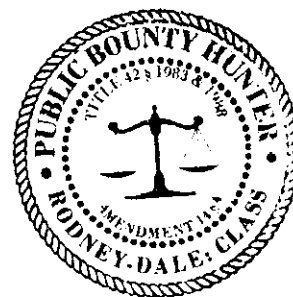
My request is for an immediate investigation and audit to detect these possible crimes against the clerk of courts office and the return to my elected position and the return of all illegally removed files by those public officials who are in insurrection and rebellion and who have gone on strike against the constitution. Who have withheld and removed books, records, files, from my County Clerk office. Furthermore one of my deputy clerk has received a threat over her personal home phone.

by an unknown party.

Karen A. Spranger

Karen A. Spranger
7520 Hutson
Warren, MI 48091

class, Rodney-Dale
Private Attorney General
14th Amendment section 4
Constitutional Bounty Hunter
1063 Jesse Drive
Cleveland, North Carolina 27013
Class, Rodney - Dale.



These are the offices that are in violation of the constitution and insurrection and rebellion

In the United States District Court
for the Eastern District of MI
Southeastern Division
Hon George Caramel Steeh
Case number. 2:18-cv-10005-GCS-DRG

Attn: Michigan Governor Office
Governor Rick Snyder
P.O. Box 30013
Lansing, Michigan 48909

United States Attorney Mike Stuart
Department of Justice
U.S. Attorney Office
Southern District of West Virginia
Sidney L. Christie Federal Building
845 Fifth Avenue

Huntington, WV, 25701

David P. Gelios FBI
477 Michigan Ave., 26th Floor
Detroit, MI 48226

Detroit Main Office
United States Attorney's Office
211 W. Fort Street, Suite 2001
Detroit, MI 48226

President Donald Trump
White House
1600 Pennsylvania Avenue NW

These are the offices that are in violation of the constitution and insurrection and rebellion and are committing mutiny.

LAWRENCE ROCCA TREASURER
ONE SOUTH MAIN,
MOUNT CLEMENS, MI, 48043.

GIUSEPPE BIONDO
DEPUTY TREASURER
ONE SOUTH MAIN,
MOUNT CLEMENS, MI, 48043.

ANTHONY M. WICKERSHAM
SHERIFFS OFFICE
43565 ELIZABETH ROAD,
MOUNT CLEMENS, MI 48043

ELIZABETH DARGA
UNDER-SHERIFF
43565 ELIZABETH ROAD,
MOUNT CLEMENS, MI 48043

FRANK KRYCIA ATTORNEY
MACOMB COUNTY CORPORATE COUNSEL
ONE S. MAIN STREET 8TH FLOOR
MOUNT CLEMENS, MI 48043

JOHN NIZOL
DEPUTY COURT ADMINISTRATOR
16TH JUDICIAL CIRCUIT COURT
40 NORTH MAIN STREET 6TH FLOOR
MOUNT CLEMENS, MI 48043

Jeff Bower
Rep. McHenry (NC-10)
Received

United States of America 115th 1st session Congressional Congress
U.S. House of Representatives Committee on the Judiciary
Senate Committee on the Judiciary

RECEIVED

RECEIVED MAY 31 2013

Commission by Declaration
know all men by these presents that
Reading Date of the family class is hereby commissioned

Committee on the Judiciary

Private Attorney General 42 U.S.C. 1988

Qualified Criminal Investigator 18 U.S.C. 1510

Federal Witness 18 U.S.C. 1512

False Claim Act 31 U.S.C. 3729

14th Amendment section 4 public debt collector Bounty Hunter

Administrative Procedure Act 60 stat 237 section 6 sub a

By Relation of several states - By Relation United States of America

Comes Now as one of The People North Carolina State of the several states and United States of America A Man upon the land has elected to become Next Friend to The People of North Carolina State and to The People of the several states by virtue of Article No. 33 and the Judiciary Act of 1789 September 24 1789 1 stat 73 Pursuant to and in accordance with reservations of rights as established the ninth and 10th Amendment to United States Constitution that states

The enumeration in the Constitution of certain rights shall not be construed to deny or disparage others retained by the people Miranda v. Arizona 384 U.S. 436-1966

Declaration and Commission

By authority invested in the House of Representatives committee on the Judiciary pursuant to in accordance with the 10th amendment to the Constitution of the United States of America that clearly states in the relevant part

The power not delegated to the United States by the Constitution nor prohibited by it to the states are reserved to the states respectively or to the People

Whereas, U.S. Congress has an active and codified the power of the Private Attorney General *de jure* Pursuant to 42 USC 1988, qualified as the appointed Private Attorney General as a Qualified Criminal Investigator Pursuant to 18 USC 1510 and guarantees his protection as a Federal Witness Pursuant to 18 USC 1512; furthermore Administrative Procedure Act 1946-60 stat 237 section 6 sub a, Article I section 8 10-11 of the Constitution of the United States of America empowers the Private Attorney General to in automatic letter of Marque and reprisal in the Admiralty jurisdiction issued by Congress upon receipt of the oath of Allegiance - public law 97-280 97th Congress; the Bible is The word of God N.J. Res. 168-90 stat 1211, of the a Private Attorney General by the clerk of the House of Representatives said as recorded by the clerk as the commission of a newly appointed private attorney general with all public ministerial duties, privileges, and ambassadorial immunities as guaranteed by the Federal Constitution and treaties of Vienna, Paris, Magna Carta Libertatum, common law authority of the supreme Court decisions, and subsequent acts of Congress consistent with God's words also known as the holy Scripture found in the Bible

Whereas U.S. Congress has Authorized the 14th amendment to the U.S. Constitution section 4 to collect public debt Whereas Congress under the False Claim Act 31 USC 3729 allow Private Individuals to act as Private Attorney General and Bounty Hunters to enforce public debt fraud such Bounty Hunter held Congressional authority to enforce the Constitution, Laws of the United States, Treaties, etc and the Laws of the several states as law enforcers. Here as 14th Amendment Bounty Hunters

Oath of Office of the Private Attorney General

I Rodney Dale of the family class say Yes, I do solemnly affirm that I will support and defend the Constitution of the United States of America against all enemies, foreign and domestic; Yes I will be trustworthy and loyal in allegiance to the same; in obedience to the word of God found in Matthew's 5:33 and I take this obligation freely without any mental reservation or purposes of evasion; and say, Yes I will well and faithfully discharge the duties of the office on which I am about to enter. My Yes is My Yes. My No is My No. Done under Penalty of Perjury without the United States without recourse. All Rights Reserved.

Rodney Dale Class

Rodney Dale Class Private Attorney General Bounty Hunter

House of Representatives Committee on the Judiciary

Senate Committee on the Judiciary

